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Hon. Brian D. Lynch  
In Proceedings Under  
Chapter 13  
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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re  
Stephen Robert Brown,  
Debtor(s),

Chapter 13 Case No: 22-40997 BDL  
STEPHEN BROWN'S DECLARATION

I, Stephen Robert Brown, declare under threat of perjury under the laws of Washington State that the following is true and correct:

I am the debtor herein, over age eighteen, and a US Citizen.

Late July, 2022 I approached Mark McClure about bankruptcy protection and if he and his firm would represent me. During our meeting, we discussed Washington State's homestead protection and the dollar amount limitations surrounding this limitation. We also discussed different strategies involved with providing a bankruptcy estate with liquidity while lowering the equity in my home prior to filing a bankruptcy.

Not having the time to approach a traditional lender before filing a case prior to entry of a judgment, I approached my father, Robert Brown, to see if he would be able to lend the money. He agreed without hesitation and wired funds to Mr. McClure's office for the purpose of funding the loan. Initially, I was uncertain as to how much I needed to borrow because we were not certain as to the value of my home. My dad sent a total of \$700,000.

DECLARATION OF STEPHEN BROWN-- 1

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**Law Office of Mark McClure, P.S.**  
1103 West Meeker Street, Ste 101  
Kent, WA 98032  
(253) 631-6484

1           On August 8, 2022, we had a zoom conference that included my father to discuss the  
2 loan, funding of the loan, and interest rate. We settled on \$500,000 as the principal  
3 amount accruing interest at the rate of 3% until the loan was due in 2027.

4           It was always my understanding that the unused portion of the amount sent to Mr.  
5 McClure belonged to my father and that only the \$500,000 became mine upon the  
6 signing of the Note and a Deed of Trust.

7           It was also always my understanding that Mr. McClure and Mr. Iwama represented  
8 me and not my father, trust, or other interested party was represented by them.

9           Dated: 10/21/2022

10          At: Fox Island, WA

11           DocuSigned by:

12             
13           Stephen Robert Brown

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15          Stephen Robert Brown, Debtor  
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23           DECLARATION OF STEPHEN BROWN-- 2

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